



MURIEL GOODE-TRUFANT
Acting Corporation Counsel

GREGORY ACCARINO
Senior Counsel
phone: (212) 356-1945
gaccari@law.nyc.gov

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

September 16, 2024

BY ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York

**APPLICATION GRANTED
SO ORDERED**

Re: Ryan Paige v. City of New York, et al.
21 Civ. 11104 (JGK)


John G. Koeltl, U.S.D.J.

Your Honor:

9/17/24

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Kevin Major, Gregg Albaum, Jonathan Santos, and Edward Reyes ("City defendants") in the above-referenced matter. The City defendants write to respectfully request a three (3) week extension of the briefing schedule for the City defendants to submit their motion for summary judgment, plaintiff to submit his opposition, and for the City defendants to submit their reply. Plaintiff does not object to this request. This is the City defendants' first such request and does not affect any other Court deadlines.

The City defendants respectfully propose the following new briefing schedule for the City defendants' motion for summary judgment:

| Deadline: | Original Deadline: | Newly Proposed Deadline: |
|---|--------------------|--------------------------|
| Deadline for City Defendants' Motion for Summary Judgment | September 27, 2024 | October 18, 2024 |
| Deadline for Plaintiff's Opposition | October 25, 2024 | November 15, 2024 |
| Deadline for City Defendants' Reply | November 8, 2024 | December 2, 2024 |

By way of background, on September 5, 2024, this Court set a briefing schedule for the City defendants' motion for summary judgment. *See* Dkt. No. 75, Order, September 5, 2024. As discussed in the City defendants' pre-motion conference letter, at his deposition, plaintiff admitted to committing the crimes for which he alleges he was falsely arrested. *See* Dkt. No. 74, Letter Motion, September 4, 2024. As a result, the parties have conferred and, based on this development, defendants respectfully request a three (3) week extension to the summary judgment briefing schedule to afford the parties sufficient time to discuss whether some, if not all, claims can be voluntarily withdrawn prior to summary judgment motion practice in the interest of avoiding the submission of unnecessary briefing to the Court. To that end, plaintiff's counsel has already indicated recognition that at least some claims should be withdrawn.

For the foregoing reasons, the City defendants respectfully request a three (3) week extension of the briefing schedule for the City defendants to submit their motion for summary judgment, plaintiff to submit his opposition, and for the City defendants to submit their reply.

The City defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino

Senior Counsel

Special Federal Litigation Division

cc: By ECF
Sameer Nath
Attorney for Plaintiff